

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA]
v.] No. 19-CR-224-JD
ALEX ARSENAULT]

ASSENTED-TO MOTION TO CONTINUE

Alex Arsenault respectfully moves the Court to continue his jury trial, currently scheduled for jury selection on March 3, 2020, for approximately 90 days.¹

As grounds for this motion, it is stated:

Mr. Arsenault is charged with possession of an unregistered explosive. He made his initial appearance on November 14, 2019. The government provided discovery on November 22 and December 4, and a search warrant affidavit was unsealed on January 27, 2020.

Defense counsel has retained an expert whose work on this case will not be complete for a substantial period of time. As a matter of efficient allocation of resources, in defense counsel's opinion, that expert's work should be completed before counsel decides whether to retain another expert as the opinion of the first expert may render moot the need for other experts. If necessary, counsel is prepared to make a more detailed proffer concerning the nature of these experts' work through a sealed filing. In these circumstances, the ends of justice served by granting a continuance outweigh the best interest of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A) & (B)(iv).

The government, through AUSA Krasinski, has no objection to this motion.

¹ No memorandum accompanies this motion because one is not necessary as the government has assented to the motion.

WHEREFORE, Alexander Arsenault respectfully moves the Court to continue his jury trial, currently scheduled for jury selection on March 3, 2020, for approximately 90 days.

Respectfully submitted,

/s/ Behzad Mirhashem

Behzad Mirhashem

N.H. Bar #10031

CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2019 the above document was served electronically upon all counsel of record through the CM/ECF filing system.

/s/ Behzad Mirhashem

Behzad Mirhashem